

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 467**

**NOTICE OF FILING OF REVISED PROPOSED ORDER (I) APPROVING THE  
DISCLOSURE STATEMENT AND THE FORM AND MANNER OF NOTICE,  
(II) APPROVING PLAN SOLICITATION AND VOTING PROCEDURES,  
(III) APPROVING FORMS OF BALLOTS, (IV) APPROVING FORM, MANNER,  
AND SCOPE OF CONFIRMATION NOTICES, (V) ESTABLISHING CERTAIN  
DEADLINES IN CONNECTION WITH THE APPROVAL OF THE DISCLOSURE  
STATEMENT AND CONFIRMATION OF THE PLAN, AND  
(VI) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on September 22, 2023 the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Debtors’ Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [Docket No. 467] (the “**Motion**”). Attached to the Disclosure Statement Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the “**Proposed Order**”).

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is a further revised proposed form of order approving the disclosure statement (the “**Revised Proposed**

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

**Order**”). For the convenience of the Court and other interested parties, a blackline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held to approve the Motion on **October 31, 2023 at 10:30 a.m. (ET)** before the Honorable Mary F Walrath, United States Bankruptcy Court for the District of Delaware, via Zoom.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 29, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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